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October 25, 2023

VIA ECF:

The Honorable Martin Glenn,
Chief Bankruptcy Judge United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004-1415
mg.chambers@nysb.uscourts.gov

Re: In re Celsius Network LLC, et al., Case No. 22-10964 (MG) – Written Request to
make Closing Statement at Confirmation Hearing

Dear Chief Judge Glenn:

Offit Kurman, P.A. is counsel to the Ad Hoc Group of Earn Account Holders (the “Ad Hoc Earn Group”) in the above-referenced chapter 11 cases. The Ad Hoc Earn Group writes pursuant to paragraph 3 of the Order Establishing Deadlines and Procedures for Closing Arguments [ECF. No. 3851] and the Order Clarifying Case Management Procedures for Closing Arguments (Modification #1) [ECF No. 3879] to request that the Court permit the Ad Hoc Earn Group through its counsel to make a closing statement (the “Closing Statement”) in support of confirmation of the Modified Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket. No. 3577]. The Ad Hoc Earn Group requests no more than ten (10) minutes for its Closing Statement at the Confirmation Hearing.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Kuhns", written over the name "Joyce A. Kuhns".

Joyce A. Kuhns